

**In the United States District Court
for the Southern District of Texas
Houston Division**

United States of America

§

versus

§

Criminal No. 4:25-CR-337

Chad Harper

§

§

Defendant's Unopposed Motion to Modify Conditions of Release

To the Honorable Judge Keith Ellison:

Comes now, Chad Harper, Defendant, by and through his attorneys of record, Brian Hobson and Wendell Odom, and hereby requests that the Court modify his conditions of release to allow travel outside the state of Texas for a family ski trip:

I

On June 24, 2025, Harper was charged by indictment in twelve counts as follows:

- Count 1 – conspiracy to defraud the United States and Pay and Receive Health Care Kickbacks in violation of 18 U.S.C. § 371;
- Counts 2-4 – substantive counts for paying Health Care Kickbacks in Connection with a Federal Health Care Program in violation of 42 U.S.C. § 1320a-7b(b)(2);
- Count 6 – Conspiracy to Commit Bank Fraud in violation of 18 U.S.C. § 1349;
- Count 7 – substantive count for Bank Fraud in violation of 18 U.S.C. § 1344;
- Count 8 – Conspiracy to Launder Monetary Instruments in violation of 18 U.S.C. § 1956(h); and,
- Counts 9-13 – substantive counts of Engaging in Monetary Transactions in Property Derived from Specific Unlawful Activity in violation of 18 U.S.C. § 1957.

II

On June 25, 2025, Harper appeared before Magistrate Judge Peter Bray. Harper was released on bond pursuant to 18 U.S.C. § 3142(c) with the following relevant condition of release:

1. Travel restricted to the state of Texas.

Dkt. 17 at 3 (section 8(i)).

III

Harper has planned a ski trip to Colorado with his family from February 18th through February 22nd. The details of that trip are as follows:

1. Harper will fly from Houston to Denver on February 18, 2026 (United Flight UA 2433).

Harper will stay at the Gateway Mountain Lodge in Keystone, Colorado during this trip.

Harper will return by plane to Houston on February 22, 2026 (United Flight UA 588).

Harper requests that the Court amend his conditions of release to allow travel outside the state of Texas as outlined above.

IV

Counsel has discussed these requests with the DOJ Trial Attorney, Devon Helfmeyer, and Harper's pretrial officer, Flor Troiani. Both are unopposed to the requests within this Motion.

Prayer for Relief

Defendant prays this Court grants this motion, amends the conditions of release for travel as outlined above, and for such further relief, general or special, at law or in equity, to which he may show himself justly entitled.

Respectfully submitted,

/s/ Brian Hobson
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Certificate of Service

I hereby certify that a true and correct copy of the foregoing Motion to Modify Conditions of Release was delivered via email to the DOJ Trial Attorney, Devon Helfmeyer, on February 10, 2026.

/s/ Brian Hobson
BRIAN T. HOBSON

Certificate of Conference

Counsel has spoken to the DOJ Trial Attorney in this cause, Devon Helfmeyer, who is not opposed to this motion.

Counsel has spoken to Harper's pretrial officer, Flor Troiani, who is not opposed to this motion.

/s/ Brian Hobson
BRIAN T. HOBSON